

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RICARDO WILSON,

Plaintiff,

v.

ROBERT (R. KELLY) KELLY, RCA, and  
SONY MUSIC ENTERTAINMENT, INC.

Defendants.

Case Number:  
1:18-CV-05014-JPB

**DEFENDANT SONY MUSIC ENTERTAINMENT’S RESPONSE TO  
PLAINTIFF’S MOTION FOR JUDGMENT OF DEFAULT**

Defendant Sony Music Entertainment (“Sony”), appearing specially, submits this Response to Plaintiff’s Motion for Judgment of Default (the “Motion for Default”) [Dkt. 71, 71-1, 2], and states as follows:

As set forth in the Memorandum of Law in support of Plaintiff’s Motion for Default, Plaintiff is seeking a default judgment against Defendant Robert (R. Kelly) Kelly (“Kelly”) for failing to respond to the Complaint which was purportedly served by personal service upon Defendant Kelly at the Metropolitan Correctional Center in Chicago, Illinois on September 29, 2020. [Dkt. 71-1, p.2-3]. While default judgment against Defendant Kelly appears to be the only relief that Plaintiff is seeking from the Court, Plaintiff references Defendant Sony on several occasions

throughout his moving papers and his supporting Declaration. [Dkt. 71-1 at p.9, 10, 12-13; Dkt. 71-2, p.10]. Defendant Sony disputes each and every allegation made against it by Plaintiff in his Motion for Default and further disputes that the instant Motion for Default is in any way related to Defendant Sony. The Court should not consider any of the baseless allegations that Plaintiff makes pertaining to Defendant Sony which are not in any way related to Plaintiff's Motion for Default.

This 22<sup>nd</sup> day of December, 2020.

Respectfully submitted,

/s/ Jordan Fishman

Hayden Pace

Georgia Bar No. 558595

Jordan Fishman

Georgia Bar No. 180796

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*Counsel for Defendant Sony Music  
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### **CERTIFICATE OF COMPLIANCE**

The undersigned counsel hereby certifies that this document complies with the type-volume limitations set forth in Rule 5.1 of the Local Rules of the Northern District of Georgia, and has been typed in Times New Roman 14 point.

*s/ Jordan Fishman*

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Jordan Fishman

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of Defendant Sony Music Entertainment's Response to Plaintiff's Motion for Judgment of Default was electronically filed with the Court's CM/ECF system and a copy of same was sent to *Pro Se* Plaintiff of record below via U.S. Mail, postage prepaid to the address below:

Ricardo Wilson, *pro se*  
478 S. Atlanta Street  
Roswell, Georgia 30075

Dated: December 22, 2020

*s/ Jordan Fishman*

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Jordan Fishman